

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BRIAN JONES,

Plaintiff,

v.

THE URBAN LEAGUE OF
SPRINGFIELD, et al.,

Defendant.

DOCKET NO. 3:04-cv-30215-KPN

JOINT PROPOSED PRETRIAL STATEMENT

Pursuant to Local Rule 16.1(D), Brian Jones ("plaintiff"), and the Urban League of Springfield and Camp Atwater, ("defendants"), submit the following Joint Proposed Pretrial Statement. Counsel for the parties conferred pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1(B).

A. Pursuant to Local Rule 16.1(D)(1), the joint discovery plan is as follows:

1. The parties' initial disclosures pursuant to Fed.R.Civ.P. 26(a) shall be served on or before April 20, 2005.
2. All written discovery, with the exception of Requests for Admissions, shall be served on or before July 15, 2005, and all responses thereto shall be due according to the Federal Rules of Civil Procedure deadlines for discovery responses.
3. All non-expert depositions will be completed by November 14, 2005.
4. Plaintiff will serve disclosures and reports of all expert witnesses required under Fed. R. Civ. P. 26(a)(2) by November 15, 2005.

5. Defendant will serve disclosures and reports of all expert witnesses required under Fed. R. Civ. P. 26(a)(2) by December 15, 2005.
6. All expert depositions will be completed by February 28, 2006 -- subject to extension if motions to compel are necessary.
7. All written Requests for Admissions shall be served by March 31, 2006, with responses due by April 28, 2006.

The parties each confirm his/its obligation to limit discovery as set forth in Fed. R. Civ. P. 26(b).

B. Pursuant to Local Rule 16.1(D)(2):

1. All motions for summary judgment will be filed by June 2, 2006.
2. Oppositions to any Motion for Summary Judgment will be filed by June 30, 2006. Any Replies to the Oppositions will be filed by July 14, 2006.
3. Should Motions for Summary Judgment not be filed by the above date, or should any such motions be denied by the court in whole or in part, the Court will convene another conference to explore settlement and to establish dates for a final pretrial conference and trial.

C. Pursuant to Local Rule 16.1(D)(3), certifications signed by counsel and an authorized representative of each party will be filed with the Court.

D. Pursuant to Local Rule 16.1(B) the parties do not consent to trial by magistrate judge.

Respectfully submitted,

DEFENDANTS

By their attorney,

PLAINTIFF

By his attorney,

/s/ Robert Leonard

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